IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, TENNESSEE

ADRIENNE JORDAN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:20-cv-0861
)	
MEHARRY MEDICAL COLLEGE,)	JUDGE CAMPBELL
DR. MEDHAT KALLINY, and)	MAGISTRATE JUDGE
DR. PAUL NGO,)	NEWBERN
)	
Defendants.)	
-	•	

MOTION TO WITHDRAW

COME NOW, the undersigned counsel for Plaintiff Adrienne Jordan, Kelli Haas, Kelli Haas & Associates, Bryant Kroll, W. Gary Blackburn, and The Blackburn Firm, PLLC, and file their motion to withdraw from representing Plaintiff Adrienne Jordan in this cause.

Pursuant to Local Rule 7.01, Plaintiff's counsel has conferred with opposing counsel as to whether they oppose this motion. Defendants' counsel indicated that they needed until tomorrow, April 19, 2023, to decide whether they opposed this motion.

As grounds, counsel would state that, following a 9.5 hour mediation that failed to result in an executed settlement agreement, the attorney-client relationship with Dr. Jordan has broken down, and Dr. Jordan has requested that the undersigned attorneys of record withdraw from her case immediately. Accordingly, counsel and Dr. Jordan request relief from the 14-day notice requirement in Local Rule 83.01(g). In addition, Local rule 83.01(g) should be waived because the dispositive motion deadline is approaching on May 26, 2023 and there is not time for an additional 14-day delay. Dr. Jordan has asked that she be granted thirty (30) days from April 17,

2023 to hire new counsel, and that her deposition currently set for April 24, 2023 be continued until she hires new counsel.

CONCLUSION

For the foregoing reasons, Plaintiffs' counsel moves this Court for an Order (1) grant leave from Local Rule 83.01(g) requiring that they wait 14 days after giving notice of an intent to withdraw, (2) that Plaintiffs' counsel be allowed to immediately withdraw as attorneys of record, (3) that Dr. Jordan be given thirty (30) days for new counsel to enter an appearance, and (4) that her deposition be continued until she has secured new counsel, but not more than thirty (30) days in the event she must proceed *Pro Se*.

Respectfully submitted,

THE BLACKBURN FIRM, PLLC

/s/ Bryant Kroll

W. Gary Blackburn (#3484)
Bryant Kroll (#33394)
213 Fifth Avenue North, Suite 300
Nashville, TN 37219
P: (615) 254-7770
F: (866) 895-7272
gblackburn@wgaryblackburn.com
bkroll@wgaryblackburn.com

/s/ Kelli Haas with permission by B.Kroll
Kelli A. Haas

Kelli A. Haas
Kelli Haas & Associates
1616 Westgate Circle,
Brentwood, Tennessee 37027
Kelli@khalawgroup.com
615-567-7300
Attorneys for Plaintiff Adrienne Jordan

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Notice of Appearance has been served upon the following via this Court's electronic CM/ECF Filing System:

Mark A. Baugh, BPR No. 015779 Jennifer Ginger Cook, BPR No. 20027 BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C. 211 Commerce Street, Suite 800 Nashville, Tennessee 37201 Telephone (615) 726-5760 Facsimile (615) 744-5760 mbaugh@bakerdonelson.com jcook@bakerdonelson.com Attorneys for Defendants Meharry and Attorneys for Estate of Dr. Kalliny. Dr. Ngo

Michelle Poss 201 Fourth Ave. N. Suite 1240 Nashville, TN 37219 Public Administrator & Representative of Estate of Dr. Kalliny.

Adam Barber Martin Heller Potempa & Sheppard, PLLC 1935 21st Ave. South, Suite 100 Nashville, TN 37212

Adrienne Jordan ajordanmd@gmail.com **Plaintiff**

This 18th day of April, 2023.

/s/ Bryant Kroll Bryant Kroll